

**Federal Defenders  
OF NEW YORK, INC.**

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Southern District of New York  
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Attorney-in-Charge

November 10, 2020

**BY ECF**

The Honorable Judge Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**RE: United States v. Anthony Young  
20 Cr. 201 (KMW)**

Honorable Judge Wood:

I write on behalf of my client, Anthony Young, to respectfully request that the Court modify Mr. Young's bail conditions to remove the condition of GPS location monitoring. This is Mr. Young's second bail modification request. The Government and pretrial services consent to this request.

Granted  
KMW

On February 27, 2020, Mr. Young was presented in Magistrate Court. The defense reserved a bail application without prejudice to make a bail argument at a later date. Magistrate Judge Sarah L. Cave ordered Mr. Young detained. On March 11, 2020, the Government filed an Indictment in Mr. Young's case. On March 13, 2020, Mr. Young was arraigned on the Indictment and a bail hearing was held in Magistrate Court before Magistrate Judge Ona T. Wang. Magistrate Judge Wang set the following bail conditions:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; pretrial supervision as directed by Pretrial Services; drug testing and treatment as directed by Pretrial Services; surrender all travel documents with no new applications and travel restricted to the Southern and Eastern Districts of New York; home detention; GPS location monitoring; no possession of firearms/destructive devices/other weapons; maintain residence approved by Pretrial Services and not to change residence; and no contact with co-defendants outside the presence of counsel.<sup>1</sup>

<sup>1</sup> There are no co-defendants in Mr. Young's case.

Judge Wang further ordered that Mr. Young was to remain detained until all conditions were met. Pretrial Services did not approve the residence the defense had proposed for Mr. Young to live during the pendency of his case. As a result, Mr. Young has remained incarcerated at the Metropolitan Correctional Center since his presentment on February 27, 2020.

On October 26, 2020, the Court granted defense counsel's application to modify Mr. Young's bail conditions to allow him to reside in a residential treatment center, Samaritan Village, rather than home detention. To facilitate Mr. Young's immediate release from the Metropolitan Correctional Center to the residential treatment facility, pretrial services and the Government have now indicated that Mr. Young's GPS location monitoring should also be removed.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

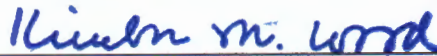
Marne L. Lenox

Assistant Federal Defender

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SO ORDERED:

11/10/20



HONORABLE KIMBA M. WOOD  
UNITED STATES DISTRICT JUDGE

cc: Assistant United States Attorney Sarah Kushner  
Erin Cunningham, Pretrial Services Officer (by email)